

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

_____)	
THOMAS PAUL LOVY,)	
)	
Plaintiff)	
)	
vs.)	Civil No. 1:13-cv-417-PB
)	
VERIZON NEW ENGLAND, INC.,)	
COMMUNICATIONS WORKERS OF)	
AMERICA LOCAL 1400, COMMUNICATIONS)	
WORKERS OF AMERICA, DISTRICT 1,)	
and COMMUNICATIONS WORKERS OF)	
AMERICA,)	
)	
Defendants)	
_____)	

COMMUNICATIONS WORKERS OF AMERICA LOCAL 1400's
MOTION FOR JUDGMENT ON THE PLEADINGS

NOW COMES Communications Workers of America Local 1400 and hereby moves this Honorable Court for judgment on the pleadings pursuant to Fed. R. Civ. P. 12(c). For the reasons set forth in the Memorandum of Law submitted with this Motion, Local 1400 respectfully requests that this Court enter final judgment on Plaintiff's claims against Local 1400. Due to the dispositive nature of this motion, Local 1400 did not seek Plaintiff's assent.

Respectfully submitted,

COMMUNICATIONS WORKERS OF AMERICA
LOCAL 1400

By its attorneys,

UPTON & HATFIELD LLP

/s/ Lauren S. Irwin

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-and-

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Dated: May 27, 2014

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was conventionally served on *Pro Se* Plaintiff Thomas Paul Lovy, PO Box 1142, Londonderry, NH 03053-1142. I further certify that the foregoing was served through ECF upon Arthur G. Telegen, Kelsey P. Montgomery and Brian L. Michaelis.

Date: May 27, 2014

/s/ James A.W. Shaw